

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :  
: Protective Order re: 3500 Material  
- v. - :  
: S1 19 Cr. 552 (JPC)  
EDWARD SHIN, :  
a/k/a "Eungsoo Shin," :  
: Defendant.  
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IT IS HEREBY agreed, by and between the United States of America, Damian Williams, United States Attorney, by Tara La Morte, Anden Chow, and Jessica Greenwood, Assistant United States Attorneys, and defendant Edward Shin, by and through his attorneys Paul Brickfield and Robert Basil, that, with respect to all materials produced under 18 U.S.C. § 3500 ("3500 Material") and other witness material marked Attorney's Eyes Only ("AEO Material"), including such materials produced on or before the date of this Order:

(1) defense counsel must destroy or return to the Government all 3500 Material and AEO Material (including all copies), at the conclusion of the trial of this matter or when any appeal has become final;

(2) Defense counsel may disclose 3500 Material (and any copies) to their respective client, Edward Shin, any paralegal or staff employed by the defense, and any expert witness the defense intends to use at trial (collectively, "Designated Persons");

(3) To the extent any Designated Person (or any other party not provided for herein) obtains any 3500 Material that is the subject of this Order, such 3500 Material shall not be further disclosed in any form, including but not limited to orally disclosing such information and posting such information on the Internet;

(4) Defendant Edward Shin, and his respective counsel of record, shall provide a copy of this Order to any Designated Persons to whom the 3500 Material is disclosed pursuant to paragraph 2. Prior to disclosure of such material to any Designated Person, pursuant to paragraph 2, any such Designated Person shall agree to be subject to the terms of this Order;

(5) AEO Material shall be prominently marked "Attorney's Eyes Only." AEO Material shall not be disclosed in any form, including but not limited to orally disclosing such information, to defendant Edward Shin, or anyone else beyond defense counsel. If counsel for defendant Shin determines that the AEO Material is material and relevant to the investigation and defense of their client and requires counsel to share the information subject to this protective order with their client, counsel for the defendant reserve the right, on notice to the Government,

to seek permission from the Court to do so.

IT IS SO ORDERED.

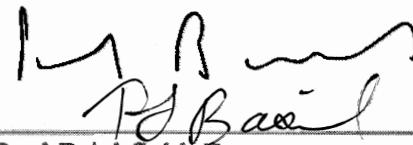
Dated: New York, New York  
October 19, 2021

  
HONORABLE JOHN P. CRONAN  
United States District Judge  
Southern District of New York

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: 

Tara La Morte/Anden Chow/Jessica Greenwood  
Assistant United States Attorneys

  
Paul Brickfield, Esq.  
Robert Basil, Esq.

*Counsel for Defendant Edward Shin*